

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE VASO ACTIVE PHARMACEUTICALS
SECURITIES LITIGATION

Civil Action No. 04-10708-RCL

MOTION TO ADMIT STEPHEN L. BRODSKY PRO HAC VICE

Pursuant to Local Rule 83.5.3, the undersigned counsel, N. Nancy Ghabai, hereby moves that this Court enter an Order granting leave to Stephen L. Brodsky, Zwerling, Schachter & Zwerling, LLP to appear on behalf of plaintiff Ira A. Turret Sep – Ira Dated 01/24/02 and proposed lead plaintiff David B. Brody and practice before this Court in the above-captioned consolidated action.

As grounds for this motion, the undersigned represents the following:

1. Mr. Brodsky is a member of the bar of the State of New York (1994), the United States District Court for the Southern District of New York (1994), the United States District Court for the Eastern District of New York (1994), the United States Court of Appeals for the Eighth Circuit (2001), and the United States Court of Appeals for the Third Circuit (2001).
2. Mr. Brodsky is a member of the bar in good standing in every jurisdiction where he has been admitted to practice
3. There are no disciplinary proceedings pending against Mr. Brodsky as a member of the bar in any jurisdiction.
4. Mr. Brodsky has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. In further support of this motion, Mr. Brodsky has submitted herewith his Certification For Admission Pro Hac Vice as required by Local Rule 83.5.3. *See* Exhibit A.

WHEREFORE, the undersigned counsel respectfully moves that Mr. Brodsky be admitted to practice before this Court *pro hac vice*.

Dated: June 8, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

/s/ N. Nancy Ghabai

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Proposed Liaison Counsel for the Class

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RULE 7.1 CERTIFICATION

I, N. Nancy Ghabai, Esq., certify that on June 8, 2004 I conferred with Colleen Dunham Henschke, Esq., counsel for defendants Vaso Active Pharmaceutical, Inc., John J. Masiz and Joseph Frattaroli regarding the filing of this motion. Counsel for defendants takes no position with regard to this motion.

/s/ Nancy Ghabai

N. Nancy Ghabai

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE VASO ACTIVE PHARMACEUTICALS
SECURITIES LITIGATION

Civil Action No. 04-10708-RCL

**CERTIFICATION OF STEPHEN L. BRODSKY FOR ADMISSION PRO HAC VICE
PURSUANT TO LOCAL RULE 83.5.3 OF THE UNITED STATES
DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS**

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Stephen L. Brodsky, hereby certify that:

1. I am an associate of the law firm of Zwerling, Schachter & Zwerling, LLP which has offices, among others, located at 845 Third Avenue, New York, New York 10022. I was admitted to the bar of the State of New York in 1994, the United States District Court for the Southern District of New York in 1994, the United States District Court for the Eastern District of New York in 1994, the United States Court of Appeals for the Eighth Circuit in 2001, and the United States Court of Appeals for the Third Circuit in 2001.
2. I am a member in good standing in every jurisdiction where I have been admitted practice.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. My name, firm name, street address, telephone number, fax number and email address are as follows:

Stephen L. Brodsky
Zwerling, Schachter & Zwerling, LLP
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212-223-3900
212-371-5969
Email: sbrodsky@zsz.com

I hereby certify under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2004

/s/ Stephen L. Brodsky
Stephen L. Brodsky